STATE OF ILLINOIS ILLINOIS COMMERCE COMMISSION

AMEREN TRANSMISSION COMPANY OF ILLINOIS)
Petition for a Certificate of Public Convenience and Necessity, pursuant to Section 8-406.1 of the Illinois Public Utilities Act, and an Order pursuant to Section 8-503 of the Public Utilities Act, to Construct, Operate and Maintain a New High Voltage Electric Service Line and Related Facilities in the Counties of Adams, Brown, Cass, Champaign, Christian, Clark, Coles,))) Docket No. 12-0598))))
Edgar, Fulton, Macon, Montgomery, Morgan,)
Moultrie, Pike, Sangamon, Schuyler, Scott and)
Shelby, Illinois.	

VERIFIED PETITION FOR LEAVE TO INTERVENE

Stephen B. Daily, Jonelle Daily, Daily Grain Farms, Ltd., Rita Getz, Alice Deininger, Rebecca Barrow, Grace Mae Daily, Elgin Daily and Genevieve Daily Scholarship Farm c/o First Mid Illinois Bank & Trust, collectively known as the Coles and Moultrie County Land Interests, by its attorneys, Hinshaw & Culbertson LLP, petition for leave to intervene in this proceeding. In support of its petition, petitioner states:

- 1. The members of the Coles and Moultrie County Land Interests who own property in Coles County include Rita Getz, Alice Deininger, Rebecca Barrow, Grace Mae Daily, and Elgin Daily and Genevieve Daily Scholarship Farm c/o First Mid Illinois Bank & Trust. The above-referenced members, except for Grace Mae Daily, own property that is described on Exhibit C to the Verified Petition filed by Ameren Transmission Company of Illinois ("Ameren") as lying within the primary route between Mt. Zion to Kansas identified by Ameren for its proposed 345 kV line. Grace Mae Daily owns property in Coles County and will be affected by the alternate route proposed by the Moultrie County Landowners.
- 2. The members of the Coles and Moultrie County Land Interests who own property in Moultrie County include Stephen B. Daily, Jonelle Daily, and Daily Grain Farms, Ltd. Their Verified Petition for Leave to Intervene ICC Dkt. No. 12-0598

property is also described on Exhibit C to the Verified Petition filed by Ameren Transmission Company of Illinois ("Ameren") as lying within the primary route between Mt. Zion to Kansas identified by Ameren for its proposed 345 kV line.

3. The interests of the members of the Coles and Moultrie County Land Interests will be directly and adversely affected if the proposed Ameren transmission line is located on their property.

4. Coles and Moultrie County Land Interests agrees to accept the status of the record as it exists at the time of the filing of this Petition and to accept service by electronic means as provided in Section 200.1050 of the Commission's Rules of Practice (83 Ill. Adm. Code §200.1050). For the purpose of receiving service in this proceeding, the Coles and Moultrie County Land Interests requests that the following persons be placed on the official service list:

Edward R. Gower Hinshaw & Culbertson LLP 400 S. Ninth St. Suite 200 Springfield, IL 62701 (217) 528-7375 egower@hinshawlaw.com

WHEREFORE, Petitioner herewith prays it be granted leave to intervene, and become a party to the above styled proceeding as Coles and Moultrie County Land Interests, for the purpose of producing evidence and cross-examining witnesses and with the right to file appropriate briefs and pleadings and participate in oral argument before the Commission, should oral argument be granted.

Verified Petition for Leave to Intervene ICC Dkt. No. 12-0598

Dated: March 4, 2013

Respectfully submitted,

COLES AND MOULTRIE COUNTY LAND INTERESTS

/s/ Edward R. Gower

Edward R. Gower
One of Its Attorneys

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STATE OF ILLINOIS)	
)	SS
COUNTY OF SANGAMO	ON)	

VERIFICATION

Edward R. Gower, being first duly sworn, deposes and says that he is one of the practicing attorneys in the firm of Hinshaw & Culbertson LLP and one of the attorneys for the Coles County Land Interests, and he is duly authorized to execute this Petition for Leave to Intervene; that he has read the above foregoing document, has knowledge of the facts stated therein and states that the matters set forth therein are true in substance and in fact.

Edward R. Gower

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SUBSCRIBED AND SWORN TO before me, a Notary Public, on this 4th day of March, 2013.

OFFICIAL SEAL
KAREN HARDY
NOTARY PUBLIC - STATE OF ILLINOIS
MY COMMISSION EXPIRES:03/20/16

Karen Harly NOTARY PUBLIC